

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

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LESLIE WILSON, :
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Plaintiff, :
 :
v. : NO. 02-CV-4662
PPL ELECTRIC UTILITIES CORPORATION, :
 :
Defendant. :
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DECLARATION OF KENNETH HARTMAN

Kenneth Hartman declares pursuant to 28 U.S.C. § 1746 that the following is true and correct:

1. I am presently employed by PPL as a Design Supervisor of the Lehigh area, a position I have held since 2001. I make this declaration in support of Defendant's motion for summary judgment.

2. As the Area Engineering Supervisor, I am responsible for designing the electrical services that PPL's customers in the Lehigh Region require for their projects. I supervise a group of Distribution Technicians who are responsible for performing much of the work required to plan the electrical services to meet the customers' specifications.

3. When a customer, such as a developer, requires electrical services from PPL, PPL employees holding the position of Service Consultants are responsible for coordinating the installation of the service. One of the functions of the Service Consultant is to

provide individuals in my group with the documents and information necessary to engineer the project, including plans, load information, expected in-service date, among other things. The Service Consultant also is responsible for managing the project, and handling any questions or complaints raised by the customer.

4. In 1999 and 2000, I, and the Distribution Technicians who reported to me, worked with three Service Consultants in Lehigh (Leslie Wilson, Robert Stano, and Dave Anderson) to provide electrical services to customers in the region. Although I had no complaints or issues concerning the job performance of Robert Stano and Dave Anderson, I had significant complaints about Wilson's performance. Wilson failed to properly manage his projects, and neglected to provide me and my Distribution Technicians with the information we required to complete the engineering work. When we did receive information from Wilson, it was often wrong or incomplete. Although my group relied on Wilson to provide us with information obtained from the developers, we were frequently forced to contact the developers directly to obtain information in order to complete jobs in a timely manner.

5. Two of my Distribution Technicians, Carol Tarr and Neil Bouc, complained to me that Wilson was not providing them with the information they required to do their jobs, or following through on tasks that Wilson said would be completed. As a result, Tarr and Bouc were forced to assume many of Wilson's job duties, which put an additional strain on my group's workload. For example, developers often would call Tarr and Bouc regarding issues that Wilson should have been handling because Wilson was not responsive to their needs.

6. On several occasions I spoke with Wilson's supervisor, Ron Pezon, about Wilson's performance deficiencies and the adverse effect it was having on my group. During one conversation, I provided Pezon with a list of developments that Wilson was not properly

coordinating. Pezon told me that he was working with Wilson to improve his performance.

After Allen Cassaday became responsible for Wilson's group in or about January 2000, I informed Cassaday of Wilson's performance deficiencies, and that the problems had not yet been rectified.

7. Wilson was the only Service Consultant in Ron Pezon's group who, from my perspective, was not performing his job duties. My Distribution Technicians never complained about Bob Stano and Dave Anderson, and I personally had no problems or issues relating to Stano's and Anderson's work performance which I thought was very good.

I declare under the penalty of perjury that the foregoing is true and correct.

Dated: August 15, 2003


Kenneth Hartman